

### **REMARKS**

Claims 1-8 are pending in this application. By this Amendment, claims 1-8 are amended. The amendments to claim 1 are supported by Applicants' specification at least at, page 2, line 27 - page 3, line 9. Claims 1-8 are amended for clarity and to correct informalities. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

#### **Rejection under 35 U.S.C. §112, second paragraph**

Claims 4, 7 and 8 were rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. Claims 4 and 7 are amended to obviate this rejection.

Accordingly, reconsideration and withdrawal of the rejection of claims 4, 7 and 8 under 35 U.S.C. §112, second paragraph, are respectfully requested.

#### **Rejection under 35 U.S.C. §102(b)**

Claims 1 and 2 were rejected under 35 U.S.C. §102(b) as being anticipated by Automatically Detecting and Visualizing Errors in UML Diagrams by Campbell et al. (hereinafter "Campbell"). This rejection is respectfully traversed.

Claim 1 recites, among other features, writing verification rules for a tool for model manipulation and producing using the tool for model manipulation a verification file based on the data and the verification rules. Campbell teaches at, e.g., page 266 first column MINERVA including the following capabilities: graphical construction of syntactically correct UML diagrams; graph-oriented consistency checks within UML diagrams; and visualizing within UML diagrams of consistency-checking results, simulation traces, and paths of execution that lead to errors. Campbell does not teach writing verification rules because Campbell merely teaches graph-oriented consistency checks within UML diagrams and paths of execution that lead to errors. These consistency

checks and execution errors do not require the writing of any rules because the consistency is an inherent part of UML diagrams and execution errors are an inherent part of execution.

For at least the foregoing reasons, Campbell cannot reasonably be considered to teach the combination of all of the features positively recited in claim 1. Further, Campbell cannot reasonably be considered to teach, the combination of all of the features recited in claim 2 for at least the dependence of this claim on allowable base claims, as well as for the separately patentable subject matter that this claim recites.

Accordingly, reconsideration and withdrawal of the rejection of claims 1 and 2 under 35 U.S.C. §102(b) as being anticipated by Campbell are respectfully requested.

#### **Rejections under 35 U.S.C. §103(a)**

Claims 3 and 6 were rejected under 35 U.S.C. §103(a) as being unpatentable over Campbell in view of Generic XMI-Based UML Model Transformations by Kovse et al. (hereinafter "Kovse"). This rejection is respectfully traversed.

It was conceded in the Office Action that Campbell does not teach wherein the file of the model, established in the UML format, is exported in the XMI format to the MIA tool. It was asserted in the Office Action that Kovse remedies these shortfalls of Campbell. As argued above, Campbell cannot reasonably be considered to have suggested the combination of all of the features recited in claim 1. Kovse, as applied to claim 1 does not remedy the above-discussed shortfalls of Campbell. Therefore, the combination of Campbell with Kovse cannot reasonably be considered to have suggested the combinations of all of the features recited in claims 3 and 6 for at least the dependence of these claims on allowable base claims, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejection of claims 3 and 6 under 35 U.S.C. 103(a) as being unpatentable over Campbell in view of Kovse are respectfully requested.

Claims 4, 5 and 7 were rejected under 35 U.S.C. §103(a) as being unpatentable over Campbell in view of U.S. Patent No. 7,480,893 to Berenbach et al. (hereinafter "Berenbach"). This rejection is respectfully traversed.

It was conceded in the Office Action that Campbell does not teach wherein the report file produced by the MIA tool is in the XML format. It was asserted in the Office Action that Berenbach remedies these shortfalls of Campbell. As argued above, Campbell cannot reasonably be considered to have suggested the combination of all of the features recited in claim 1. Berenbach, as applied to claim 1 does not remedy the above-discussed shortfalls of Campbell. Therefore, the combination of Campbell with Berenbach cannot reasonably be considered to have suggested the combinations of all of the features recited in claims 4, 5 and 7 for at least the dependence of these claims on allowable base claims, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejection of claims 4, 5 and 7 under 35 U.S.C. 103(a) as being unpatentable over Campbell in view of Berenbach are respectfully requested.

Claim 8 was rejected under 35 U.S.C. §103(a) as being unpatentable over Campbell in view of Kovse further in view of Berenbach. This rejection is respectfully traversed.

It was conceded in the Office Action that Campbell and Kovse does not teach wherein the report file produced by the MIA tool is in the XML format. It was asserted in the Office Action that Berenbach remedies these shortfalls of Campbell and Kovse. As argued above, Campbell cannot reasonably be considered to have suggested the combination of all of the features recited in claim 1. Kovse and Berenbach, as applied to claim 1, do not remedy the above-discussed shortfalls of Campbell. Therefore, the combination of Campbell with Kovse and Berenbach cannot reasonably be considered to have suggested the combination of all of the features recited in claim 8 for at least the dependence of this claim on allowable base claims, as well as for the separately patentable subject matter that this claim recites.

Accordingly, reconsideration and withdrawal of the rejection of claim 8 under 35 U.S.C. 103(a) as being unpatentable over Campbell in view of Kovse further in view of

Berenbach are respectfully requested.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the present application should be in condition for allowance and a Notice to that effect is earnestly solicited.

Early issuance of a Notice of Allowance is courteously solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

**LOWE HAUPTMAN HAM & BERNER, LLP**

A handwritten signature in cursive script, reading "Kenneth M. Berner".

Kenneth M. Berner  
Registration No. 37,093

1700 Diagonal Road, Suite 300  
Alexandria, Virginia 22314  
(703) 684-1111  
(703) 518-5499 Facsimile  
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**KMB/MIL/bjs**